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March 15, 2007

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re: Marginulina Vaginata Sand, Reservoir A

Sullivans Lake Field Iberville Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BROWNING OIL COMPANY**, **INC.** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters:

- 1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of oil and gas from the Marginulina Vaginata Sand, Reservoir A, in the Sullivans Lake Field, Iberville Parish, Louisiana, said unit to be designated MARG V RA SUA, as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To designate Browning Oil Company, Inc. as operator and its Schwing No. 3 Well as unit well of the proposed unit.
- 4. To provide that any future replacement and/or alternate unit wells drilled to the Marginulina Vaginata Sand, Reservoir A, should be located in accordance with the provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 5. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing should the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.

6. To consider such others matters as may be pertinent.

The Marginulina Vaginata Sand, Reservoir A, in the Sullivans Lake Field, is hereby defined as being that oil and gas bearing sand encountered between the depths of 11,802 feet and 11,895 feet (electrical log measurements) in the Union Texas Petroleum Corp. – Schwing No. 1 Well, located in Section 75, Township 10 South, Range 11 East, Iberville Parish, Louisiana.

Pursuant to the Rules of Procedure, a pre-application conference was held on March 14, 2007, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the applicant's proposal. Questions were asked and answered. Representatives of landowners presented three counterplans. Differences amongst the parties could not be resolved at the conference which was then adjourned. Negotiations continue with the parties presenting counterplans in the hope a complete resolution of differences can be reached prior to the hearing.

Attached hereto and made a part hereof are: the plat, the conference attendance list and the list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, the plat (being the same plat attached to the pre-application notice dated February 19, 2007) and list of parties are being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the plat and/or list of parties will be furnished to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check in the amount of \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

Richard W. Revels, Jr.

RWRjr/dbf Attachments 190752_1 11301.0010

cc:

Mr. Richard Hudson, Lafayette District Office of Conservation

cc: Interested Owners, Represented Parties and Interested Parties

